

1       A     And then eventually ah, name me as -- in February of  
2             2002 as the chairman of the ah, vocational ah,  
3             department, education department. So, I figured  
4             that meant, you know it was pretty well established  
5             that they had a department and there was a chairman,  
6             you know necessary as a position.

7             So, again, for a period of like six months, ah  
8             I was ah, awaiting a decision that could have had me  
9             ah, not be employed and I accepted it if ah -- if it  
10            was shown to me, ah but I knew that I was needed ah,  
11            and eventually they called a meeting and, I guess  
12            the position was put back in place.

13       Q     Um, you claim that Senate House Joint Resolution ah,  
14             what's the number....

15       A     Thirteen?

16       Q     ....13-6 was delivered to NMC um, what do you mean  
17             by that?

18       A     I read the resolution and at the -- ah, the House  
19             Clerk attest, certifies that copies will be  
20             delivered to ah, various people and institutions and  
21             NMC was listed.

22       Q     Was listed on that?

23       A     Yes.

24       Q     Okay, um you claim that the Regents, Wright, and  
25             Moyer ah, ignored your workload? What do you mean

1 by that in paragraph 68?

2 A From the standpoint of ah, lack of budget. Um, and  
3 that ah, Public Law 10-66 ah, allocated money for  
4 vocational programs and 90% of the money they gave  
5 to the college went to the School of Education which  
6 was ah, contrary to the intent of Public Law 10-66?  
7 Because the intent of 10-66 later on -- well, prior  
8 there was 5-32 public law, is to train local  
9 residents ah, to replace contract workers and they--

10 Q And they couldn't do any of this without you? Is  
11 that your allegation?

12 A No, it's a fact that ah -- ah I was championing the  
13 philosophy and I was getting through the Legislature  
14 because they brought me up to a hearing with the  
15 Acting President Alvaro Santos at the time in  
16 ninety, about '99 or, in that time frame, they asked  
17 me what I was doing with the million dollars that  
18 they were giving to me in the vocational department  
19 and I looked at them, and Alvaro jumped in and said,  
20 there's a big misunderstanding. He receives zero of  
21 that money and that's why we're -- he was trying to  
22 correct that and they were amazed that they asked  
23 where did this money go and they -- well, they found  
24 out that 90 plus went to the School of Education and  
25 they said, well, isn't that a vocational field,

1 teaching? I said yes, it is, as a matter of  
2 speaking, but the intent of the law is to train  
3 local residents to fill positions that are held by  
4 contract workers. The teachers do not replace  
5 contract workers because, by statute, there can be  
6 no contract workers that teach, so they were ah --  
7 that's why they came up with this resolution later  
8 of 9-52 -- excuse me, of ah, 13-6 and then they were  
9 -- that position they -- they wrote President Wright  
10 a letter saying that if he does not, I guess conform  
11 and put some money in, that um -- that they would  
12 pull the money and he had to write a series of  
13 letters justifying saying, no, we do have a  
14 vocational program, we do have a director, et  
15 cetera, et cetera, and this was done in Feb --  
16 January, February of 2003.

17 So, again, they ignored the law um in that they  
18 ah, were programming the money to the wrong place  
19 and I explained my position, I mean I said I don't  
20 wanna jeopardize the School of Education, however,  
21 all the positions are funded by the Legislature and  
22 um -- and they receive an enormous amount of tuition  
23 and fees, so basically um, they were getting, you  
24 know the best of two worlds, they're getting all  
25 their ah, salaries are being paid for through my

1 program's money and without a share, I say at least,  
2 ah you know a share situation. Ah and I brought  
3 this up and there's letters, I think they're  
4 included, if not I'll supply them later, that I  
5 wrote the Legislature. I even filed a ah, letter  
6 with the House on Education or Subcommittee on  
7 Education and Welfare, Brigid Ichihara, I think she  
8 was in charge, asking her to look into this matter  
9 ah, of the lack of a budget.

10 So, again, they were ignoring this law and then  
11 they're -- they ignored the fact that I had ah, a  
12 lot of students and a lot of programs and it was a  
13 workload. I was doing it single handedly.

14 Q And they told you that that was no longer needed?  
15 That workload? I mean that work that you were doing  
16 was no longer necessary?

17 A I, the person, could be replaced. My position, no.  
18 It was a very needed position and I'm not saying  
19 that ah, I was not -- you know, I was -- a law came  
20 out that said Angello has to be there.

21 MR. SMITH: No. Understood.

22 A It's the position had to be there and I figured if I  
23 was doing a ah, satisfactory job it went hand-in-  
24 hand that I would continue in that position and my  
25 evaluation said that I was doing a satisfactory job.

1           So, again, um the workload was ignored in that  
2           ah, here I had 90, 80, whatever students in that  
3           particular semester I was terminated and at the same  
4           time I got the records of the School of Nursing  
5           which had a director, I think administrative  
6           officer, another secretary, I believe maybe had a  
7           total of 15 nursing students.

8           So, again, when you compare ah, workloads and  
9           people and staff, there was a little bit of an  
10          imbalance there. And, again, I'm not saying that  
11          the nursing program was not worthy. It is a very  
12          worthy program. It just I wanted ah, some equity  
13          ah, in that the vocational program be given some,  
14          you know budget and some ah, support.

15        Q     And, do you know if your workload was ever  
16              transferred over to other ah, people or positions  
17              in--

18        A     After I left?

19        Q     After you left?

20        A     Yeah, from people that emailed me and talked to me  
21              from the college, ah the workload was first  
22              transferred to the Math and Science Chairperson, but  
23              eventually he was objecting? To it? And then, of  
24              course, Jack Sablan was made director, but they gave  
25              me an email where he gave all the workload to Larry

1 Omni and then Lino, at times, would complain because  
2 he'd go to Jack Sablan and Jack Sablan says I don't  
3 take care of that, go to Larry Omni or the new  
4 chair, I guess now who's in that position, so he's  
5 frustrated to be going round and round in circles,  
6 so the workload was being placed elsewhere, but not  
7 ah, successfully, from what I can gather. And, of  
8 course, the ah, unfortunate ah, cause, you know  
9 negative impact it had on the programs.

10 Q Okay. What employment positions were offered to  
11 you, um in what you alleged was a sham effort? In  
12 paragraph 82?

13 A There's a letter that I believe is part of ah,  
14 discovery that you received from ah, President  
15 Wright after -- I think it was a week after the 24<sup>th</sup>  
16 of September time frame? He wrote a letter  
17 addressed to me, and I know other people received a  
18 similar letter, that ah, saying we were good  
19 employees and there were, like four different open  
20 positions and I should apply for them. So, ah--

21 Q Did you?

22 A Yes.

23 Q And, what happened?

24 A Um, some of the early interviews I would be brought  
25 in after the selection committee and be interviewed

1 by the President himself and ah, the fact that he  
2 ah, asked if I drop everything, then he would ah --  
3 there would be a position available for me and I  
4 said ah, you know the Civil Service matter is out of  
5 my hands, I mean it's being handled by them and so--

6 Q So, he was actually negotiating with you? In your  
7 meeting with the president?

8 A Well, I don't think ah -- ah the way it was brought  
9 to me it was like, ah you know drop everything and  
10 then -- then I'll consider you for a position and  
11 I've heard that the year before, if I drop  
12 everything, then I'd still be not considered, so I  
13 said ah, the Civil Service matter is ongoing and I  
14 think it should be cleared up for the sake of all  
15 employees. Ah, because there's a gray area there.  
16 MR. SMITH: Uh-huh.

17 A So, I said ah, of course, if I went back to work,  
18 employment, ah things do naturally get, you know  
19 dismissed and dropped, but I didn't wanna get into  
20 it because it was not a matter that I should really  
21 discuss with him. I was there to say that I was  
22 available for a position.

23 Then, the next interview, he accused me of not  
24 having a doctorate degree and ah, he asked me why I  
25 was ah -- ah putting that in my resume' and making

1           it public and it was somewhat upsetting so I just  
2           asked him to refer or consult Bobby Hunter who was  
3           there and Bobby Hunter had my bio data and he had a  
4           copy too, she turned to like the third page in and  
5           showed him my diploma from U.S.C. So, then he goes,  
6           oh. Oh, I see you have one.

7           So, it was just a matter of ah, it was somewhat  
8           gut wrenching going through these ah, interviews  
9           knowing ah, that if, you know I could have been  
10          Einstein and still he wouldn't have hired me if he  
11          ah -- ah if there was an opening? So, it was a  
12          sham, just to cover the fact that the Legislature  
13          were there investigating and ah -- and then again,  
14          to -- and then later on they ah -- they even put in  
15          the paper that ah, I think the board chairman that  
16          none of us would be reinstated. Ah I thought that  
17          was an out statement in that ah, you know if we did  
18          a good job and they gave us a letter stating we did  
19          a good job and they're opening positions why  
20          couldn't we -- we reinstated, you know go about our  
21          lives. So, again, I stand with what I wrote there.

22        Q       Okay, in paragraph 94 you talk about um, Moyer  
23                engaging in discriminatory actions. Why do you  
24                allege that ah, Moyer lacked EEO training?

25        A       Um relating to this sexual harassment training.



1 Q Okay, so and the EEO training we discussed earlier  
2 about that that is something that's ongoing at NMC,  
3 um but you say you're talking about something other  
4 than EEO training? Or -- or what training, I'm  
5 still having a difficult time as to what training  
6 should have taken place. If we're talking EEO  
7 training? Or specific sexual harassment training.

8 A Well, sexual harassment training would take care of  
9 ah, EEO matters, but also I think would take care of  
10 ah, Fair Labor practice, you know different ah,  
11 requirements, federal and state. Ah even our state  
12 level, ah we have an EEO office brought on by the  
13 ah, EEOC which is the federal level. So, again, ah  
14 with no, ah no repri -- you know, any sort of ah,  
15 control over Barbara Moyer, ah I felt that she could  
16 feel that could repeat since ah, there was no  
17 training and then also that there was no ah,  
18 situation of -- the only situation that I saw was  
19 positive was when Jack Sablan in that meeting  
20 removed her from the ah, management level of our  
21 film and TV. I thought that was a positive ah,  
22 training ah, or movement because we wrote on behalf  
23 of my entire staff ah, signed the memo for us to be  
24 removed from her supervision.  
25 MR. SMITH: Uh-huh.

1       A     So, it was across the Board. Not only myself, ah I  
2             think it's in ah, the memo there that I provided.  
3             It has the signatures of Lino Santos, Ike Masga and  
4             I think Randall Johnson. Randall Nelson? I think  
5             it's Randall something who worked for my department  
6             for a while and all of us wrote and signed this ah,  
7             or memo that please transfer us away from her  
8             management.

9             MR. SMITH: Okay.

10       A     And then nothing -- and nothing was done except for  
11             like I said Jack Sablan, under threat of suit by Mr.  
12             Wolfe, that ah, she was removed from ah, the  
13             position of--

14       Q     And, how do you know that that was by a threat of  
15             suit that that happened? How do you know that's the  
16             reason that she was removed?

17       A     Because I was there at the meeting with Mr. Sablan  
18             hearing from Mr. Wolfe the problems he was having  
19             and I was having with this Barbara Moyer once we get  
20             -- even the previous semester we had a letter signed  
21             that Jack Sablan approved and had Dean Camacho sign  
22             that you are on the schedule and Butch Wolfe went  
23             back to L.A., L.A. the last minute to get some more  
24             equipment and things and ah, a week later I had to  
25             inform him that within a couple of days of the

1 schedule I get the previous -- I mean the  
2 preliminary schedule we were ah, removed again, the  
3 film and TV. So, ah these were intentional ah,  
4 actions and it was done, you know how would somebody  
5 get away with this unless they were not controlled  
6 ah, by upper management and I felt that it was  
7 lacking.

8 Q Okay. Ah, and how did this damage your public and  
9 professional reputation?

10 A When you go out in the public and you announce the  
11 program, ah you talk to students, staff, other  
12 schools, institutions and you say the program is  
13 going ah, starting this semester, EAP, the amount of  
14 time, the tremendous amount of time to get ah,  
15 people eligible, to get all their paperwork in, then  
16 all of a sudden, the last minute, ah you know they  
17 call and say you're not in the schedule. You know  
18 why is it being -- and they look at me, I'm the one,  
19 I'm managing it, so is it something -- that came up  
20 later in that there was an accusation that I wasn't  
21 managing the program properly. So, it goes without  
22 saying if you're ah--

23 Q You've had people come up to you? Or you had  
24 problems getting hired specifically because of -- of  
25 this damage to your reputation? Or -- or I mean,

1           you've had -- you've actually seen this

2       A     Well, if I--

3       Q     ....ruin your reputation? Outside of the situ.

4       A     If I was given the support for the programs,  
5           especially the film and TV, there would have been no  
6           grievance. There would have been no, ah later  
7           retaliation. I would not have been terminated.  
8           There would have been no lawsuits. And, right now  
9           I'm considered a ah, what, litigious person?

10      Q     And, you believe that that was not the case prior to  
11           this ah, termination with NMC?

12      OFF/ON RECORD - Continued on Tape 4, Side A.

13           MR. SMITH: Okay, this is the resumption of the  
14           deposition of Jack Angello, today's date is October 5<sup>th</sup>,  
15           2004, and the time is 1:33 p.m., this is in the case of  
16           Angello versus NMC. Um, we were talking and got cut off,  
17           um you know what? Let me pause this for a second just to  
18           check--

19      OFF/ON RECORD

20           MR. SMITH: Um having my memory refreshed, um we were  
21           talking about your public and professional reputation as  
22           a result of your termination. Um, and your comment was  
23           that your reputation has been damaged because you have  
24           seen -- you are now seen as a litigious individual, is  
25           that -- am I stating that correctly?

1       A     In a matter...[cleared throat], excuse me, in a  
2             matter of speaking ah, in a small island community  
3             that we have, everybody knows everybody else's  
4             business and in jobs ah, especially at my level, my  
5             degree and experience, it's difficult to get a job  
6             at times. Ah, so again, the termination especially  
7             with only a couple of years left before retirement  
8             was ah, very untimely and ah, very damaging. Ah,  
9             especially the type of termination where you're  
10            basically told to leave that same day and they lock  
11            the doors, gave the impression that we were involved  
12            in some type of ah, maybe ah, negative activity.

13                 And, then again, on a small island here, ah  
14                 when you do file, it doesn't make you a ah, say  
15                 positive type person in the hunt for a new job  
16                 because in some of my job interviews ah, like with  
17                 the government, I was asked even in the interviews  
18                 if they hired me, would I consider ah, suing them  
19                 and I thought it was a very strange question and I  
20                 said, ah I've only filed suit when I felt that I've  
21                 been harmed.

22                 And so, again, um I knew they were hesitant ah,  
23                 one, from the standpoint I was terminated in a kind  
24                 of a situation where they first said it was savings  
25                 in money and then later on they said it was actually

1           ah, we weren't doing work, our jobs are--

2           Q     Wait. Wait, wait. When was this? When did that  
3                 change?

4           A     Ah the -- the ah, once -- one was because of money,  
5                 but in our letters of -- my letter of termination it  
6                 said my position was unnecessary, so I meant  
7                 basically that ah -- that there was no work  
8                 apparently or what I could -- what I was doing could  
9                 easily be done by somebody else. And then in the  
10                Board minutes of 9/23, I've got a copy, the  
11                president made a comment that changes needed to be  
12                made and he would make ah, some changes in the  
13                vocational program because he's heard the vocational  
14                program has not been responsive to the community and  
15                ah, that, I considered, ah an insult in that ah, he  
16                never mentioned that to me, he never investigated  
17                and he even went on record and Mr. Wolfe was there,  
18                that I had no money to operate the vocational  
19                program, so how could I run an effective program. I  
20                did it on my own basically. Like I said earlier I  
21                spent thousands of my (?) money keeping the program  
22                running because I believed in it ah, wholeheartedly.

23                So, again, ah the damage ah, was done in a  
24                public fashion, in the newspaper, and also  
25                professional. And ah, I've talked to other members

1 of the staff and they were asked, you know were we  
2 needed and they, of course, ah being under the  
3 threat because, you know that without cause clause  
4 was still in effect, they would say, oh yeah, they  
5 weren't needed and ah, there were comments that I've  
6 seen in ah, certain letters that maybe we weren't  
7 doing that much of a job, et cetera, et cetera.

8 So, it doesn't -- the matter of, you know the  
9 letter of termination that says you did a nice job,  
10 ah I'll give you a letter of recommendation, blah-  
11 blah-blah, but you read the paragraph above, please  
12 leave your office, within four hours we're gonna  
13 lock the doors. I mean, if you were a manager and I  
14 came out with that letter, what would you think.  
15 Ah, wouldn't you think there was something funny?

16 Q What ah--

17 A So.

18 Q What ah, do you not consider yourself a litigious  
19 person prior to this having happened in this ah,  
20 this situation that you've encountered with ah--

21 A I don't consider myself a litigious person. I  
22 consider myself, ah just a United States citizen who  
23 has the right to file if I'm wronged and -- and like  
24 I say, ah I file when I feel something is wrong and  
25 for the most part I won ah, the cases that I filed.

1 Q You talk about this being out in the public, have  
2 you brought any of this into the public and to the  
3 media yourself?

4 A The -- you brought this up on a few occasions, I've  
5 always run to the media, which is untrue. Ah they  
6 read the filings and the documents.

7 Q Do you provide those documents to them?

8 A They ask ah, for the documents and I say I only have  
9 my own file copy and they've at times asked if they  
10 could borrow it and they'd return it within a couple  
11 of days.

12 Q How do they know when something new has been filed,  
13 do you telephone them?

14 A Ah they follow ah, the case and from the previous  
15 filing they know about the time frame? And then the  
16 court reporters make ah, I believe daily visits?  
17 All the filings? I think you're aware of that?  
18 They go both to the Superior and the Federal Court  
19 and ah, they check all the filings and then when  
20 they see my name, of course, ah they explain that  
21 this was kind of a high profile case because of the  
22 news it generated from the beginning.

23 Q Was this the first time any of your cases have been  
24 in the media?

25 A I had a PSS case I talked, I mentioned earlier that



1           ah, was in the media.

2           Q     And, who took that to the media?

3           A     PSS.

4           Q     Did you file anything with the media back then?

5           A     I was off island, ah and nothing -- everything they  
6           got was from the media -- ah from the filings and  
7           from ah, PSS. They ah, did some media. They  
8           provided information to the media.

9           Q     How about your lawsuit against ah, the ah, Presiding  
10          Judge or Judge Castro, did you take that to the  
11          media?

12          A     No.

13          Q     Your Open Government? Is this the first case in  
14          which you provided any information to the media? In  
15          terms of pleadings or documents?

16          A     My own case?

17          Q     This case right here?

18          A     Ah at -- the first time, that's at their request ah,  
19          because of it making headlines from the very  
20          beginning, so ah, and they saw that I had won the  
21          early battles, like the Civil Service? They issued  
22          the order that I could have a hearing, then later  
23          on--

24          Q     Who provided them a copy when the order came out?

25          A     Ah, I don't, ah--

1 Q Did you provide that to them?

2 A That, no because it was ah, I might have provided on  
3 request because I got the copy -- I was in the  
4 courthouse, they were there when I received it. As a  
5 matter of fact, Jess, ah your partner was there.  
6 No, when the, excuse me, when Judge Lizama's order  
7 came out and ah -- and I was reading it and the lady  
8 showed it to me and says, read this, ah somebody  
9 won. Then I read it and it was a shock because ah,  
10 you know I didn't realize it was my order and then  
11 the media was standing next to me and I looked up  
12 and I said, it feels like a good day and they quoted  
13 me, I think to that effect.

14 Q Did you give that to them and tell them about it at  
15 that stage?

16 A They were there and they had copies, they leave  
17 copies ah, they request and they leave them. I'll  
18 see them there because in my Attorney General's job  
19 I go to the court, get our mail, and I see ah, a lot  
20 of filings with Variety, Tribune, they're provided  
21 by the Clerk of Court.

22 Q Um have you ever provided any documents without  
23 being requested or there first been an inquiry from  
24 the media? Have you ever independently gone to the  
25 media? About this case or any of your cases?

1       A     My whole life?

2       Q     No, about this case or any of the cases with NMC?

3       A     Ah, well, you have to realize that when I was a  
4             director at NMC, I constantly went to the media with  
5             my programs. We had no PR office and ah, so I would  
6             provide write ups for the programs and ah, pictures  
7             ah, and they're very -- ah they enjoy them. They  
8             use them. They use all of them. So, of course,  
9             when I was -- I created a rapport and they'd always  
10            ask documentation so then when the ah, lawsuit was  
11            filed, because they wanted to know who's gonna file,  
12            they asked all the ah, people and they saw that I  
13            had filed and had gone through the Civil Service  
14            process which was unique in a way, ah so they -- the  
15            report is they only report what's of interest and  
16            so, ah they'll call me on occasion and say what's  
17            going on in the case and I'll say, ah at this point,  
18            ah all I've said there's a trial date and they asked  
19            when, I said some time in November and then ah--

20       Q     Who would you call -- or who would call you? Who  
21             were your relations with the press with, those that  
22             you had established through your work?

23       A     The various reporters for the Variety and ah--

24       Q     Who's that?

25       A     Um, that's ah they switched, what was her name?

1 Gemma?

2 Q Gemma?

3 A I think Gemma.

4 Q For the Variety? And who -- and who else?

5 A Um at the Tribune it would be...[pause], Liberty  
6 would be one, then they changed, ah it's a new  
7 reporter. So, again, when I was in the programs I  
8 would provide? When I worked at the Legislature I  
9 provided information to the media for the  
10 Legislature because I was volunteering doing ah,  
11 work for them so ah, information is released to  
12 them. Ah, I've been in public relations, I worked  
13 as a PIO. So, again, ah--

14 Q So, it was very natural for you to refer things off  
15 to the media?

16 A If they asked and if it was of interest.

17 Q And, in this case with NM -- NMC, you referred only  
18 if asked?

19 A Is there a law against that?

20 MR. SMITH: No. I'm just curious. I'm asking.

21 A You think like it's intentionally trying to harm  
22 them?

23 Q No, no, no, you complained that ah -- that things  
24 were in the media, so I'm just trying to find out  
25 ah, did you ever independently refer things to the

1 media?

2 A Probably? I can't really recall any specific thing,  
3 ah--

4 Q A Department of Agriculture letter? Or a ah,  
5 auditor's letter or anything, um?

6 A That, yeah, I provided because of the ah, in -- when  
7 I was applying for the presidency, so I thought it  
8 was good for my ah, position to supply that in that  
9 I found the project that USDA liked. It was a  
10 project that was sitting on the shelf at the  
11 college, so I felt as an educator and as a possible  
12 administrator, I wanted to put that forward, that  
13 ah, we should go forward. That project would save  
14 the college a lot of money and so I ah--

15 Q Why did you take it to the media, instead of to the  
16 college?

17 A I'd taken it to the college earlier because I was  
18 there when the project was being put together, it  
19 was part of my Pacific Rim and they just ignored it.  
20 I mean like Tony Guerrero said it's a dead, or  
21 something, the deal is too expensive when I couldn't  
22 understand that because it's on school property,  
23 it's not on La Fiesta property, it's on government  
24 property and USDA blessed it as a viable project.

25 Q Would you say that a lot of this public recognition

1 or -- or reputation that you have as a litigator is  
2 from your own referrals ah, to the media? Of  
3 information? From your own conversations with the  
4 media?

5 A Small percentage.

6 Q How small a percentage?

7 A Um, you want a number?

8 Q Yeah. A guestimate if you got one?

9 A Say 10 to 20 percent. Because you can -- you can  
10 submit, you know if you've been in the media, you  
11 submit a hundred pages, they might use one  
12 paragraph, so. Again, they -- it's the paper they  
13 have to sell, they have to sell news, if it's not  
14 newsworthy, they don't put it in.

15 Q Have you ever written letters to the editor  
16 regarding your situation with the college?

17 A I wrote one letter trying to clear up the fact that  
18 I'm not Dr. Jess Camacho.

19 Q Is that the only letter you have written regarding  
20 your NMC litigation or after your termination?

21 A I believe so. I believe so.

22 Q And, are you Dr. Camacho?

23 A No.

24 Q Do you know him?

25 A Yes.

1 Q How do you know him?

2 A He got ah, my email address and ah, he sent me an  
3 email ah, some time ago supporting my cause and ah,  
4 basically ah, what he was doing and then I email  
5 back, let me explain, I asked him what he was doing  
6 and he asked me why because I said I'm gonna write a  
7 letter because a lot of people are coming up to me  
8 and saying I'm Dr. Camacho, so I wanted to find out  
9 where you live, and he gave me it's Delano,  
10 California? And, ah then I wrote a letter saying  
11 that even in Delano, he's been an educator, an  
12 administrator, et cetera, et cetera, but to this day  
13 they still think that I'm writing those letters.

14 Q His letters that he has sent, his various letters,  
15 have you ever helped him co-author or give -- gave  
16 any input for any of his letters?

17 A He uses ah, from what I can gather? Ah, he -- ah  
18 Internet? I think it's both the Tribune and the  
19 Variety? And he follows that, plus he has um, he  
20 mentioned he has a network of maybe, I don't know,  
21 50 people that sent him information, various people.

22 Q Have you ever referred him off to any particular  
23 Variety articles or to any particular people or  
24 anything like that?

25 A I just ah, talk to him in general, ah having we -- I

1 think we talked about U.S.C. football because we're  
2 both graduates of U.S.C. and then he'll mention, am  
3 I hanging in there, about the litigation, and I say,  
4 yes, I'm trying to get it wrapped up, hopefully get  
5 it settled. We'll see how it goes. So he just says  
6 -- he just gives me words of encouragement.

7 Q How many times have you spoken with him?

8 A Over the phone, once.

9 Q How about by email?

10 A Email? Average? Ah, it depends on ah, if something  
11 really hits the newspaper, then he'll email me and  
12 just say, did you read, just you know general  
13 conversation.

14 MR. SMITH: Uh-huh.

15 A And I'd yeah, you know and then ah, every two, two  
16 weeks I might -- three weeks I might get an email.

17 Q And, has that been going on since your termination?

18 A No, it started ah, after I wrote the letter to the  
19 editor saying I'm not Jess Camacho.

20 MR. SMITH: Okay.

21 A Oh excuse me, I did -- I found out who he was and  
22 where he worked prior to that from another source,  
23 then I wrote that letter, then he wrote to me and he  
24 ah, thanked me for it because I gave him credit for  
25 being articulate, ah and I thought it was a -- you



1 know he writes well. I didn't go into much of the  
2 subject -- and we did agree on, you know certain  
3 parts of the La Fiesta situation.

4 MR. SMITH: Okay.

5 A Because he had given advise I guess to President  
6 Wright, at one point was being ah -- ah groomed for  
7 a job or something, he mentioned to that effect and  
8 I know he's applied for ah, like the previous  
9 presidency opening? He applied and he was ah, I  
10 believe denied an interview? So, he ah -- he brings  
11 up these topics about ah, just general education. He  
12 is an -- he is an educator and he does feel for the  
13 islands and the students here.

14 Q What ah -- what loss of professional earnings um,  
15 and benefits are you referring to when -- when you  
16 make this allegation in paragraph 94?

17 A Ah well, my paycheck for 14 months.

18 MR. SMITH: Okay.

19 A Um, I had no life insurance. I had no medical.  
20 Luckily my wife had medical that covered my family  
21 during that time. Um, life insurance, medical, ah--

22 Q So not medical because you--

23 A Yeah, that could be--

24 Q You were covered?

25 A Yeah.